

**COMMONWEALTH OF MASSACHUSETTS**  
**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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**INVESTIGATION BY THE D.T.E. ON )**  
**ITS OWN MOTION TO INVESTIGATE )**  
**INCREASING THE PENETRATION )**  
**RATE FOR DISCOUNTED SERVICE )**

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**D.T.E. 01-106**

**COMMENTS OF BAY STATE GAS COMPANY**  
**November 14, 2002**

**I. INTRODUCTION**

As a general matter, Bay State Gas Company (“Bay State” or “Company”) believes that the best strategy for increasing the penetration for discounted electric, gas and telephone service is to devise the simplest and most efficient application process possible. Simplicity in the application process is critical, as many applicants for discounted utility service are ill equipped to deal with complex application process due to limited English proficiency, functional illiteracy or various disabilities. For instance, the Office for Civil Rights of the U.S. Department of Health and Human Services has found that “persons who lack proficiency in English frequently are unable to obtain basic knowledge of how to access various benefits and services for which they are eligible”<sup>1</sup>. The obvious conclusion that can be derived from this is that an unnecessarily complex process

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<sup>1</sup> Department of Health and Human Services, *Policy Guidance on the Prohibition Against National Origin Discrimination As It Affects Persons With Limited English Proficiency*, Federal Register, Vol. 65, No. 169, Wednesday August 30, 2000, p. 52763.

will adversely impact the penetration for discounted utility service and is, therefore, inconsistent with the intent of this Investigation.

The balance of these comments address the two questions posed in the October 31, 2002 Hearing Officer's Request for Comments.

## II. RESPONSE TO QUESTION #1

The introduction of a check box, similar to that used by fuel assistance agencies for new applicants for the Department of Transitional Assistance ("DTA") and the Division of Medical Assistance ("DMA") granting the agencies authorization to release eligibility information to utilities is philosophically consistent with the current process, in that it allows applicants control over the dissemination of information regarding their application for public benefit programs. A *requirement* for applicants to authorize the release of eligibility information as a condition to applying for public benefit programs would certainly be more effective than use of a voluntary check box and would, therefore, result in a higher penetration for discount utility service. It must be recognized, however, that such a change eliminates the control that applicants currently have over dissemination of information regarding their application for public benefit programs.

## III. RESPONSE TO QUESTION #2

The use of a central entity for gathering relevant information from Community Action Programs and government agencies such as the DTA and DMA and dissemination of this information to utilities has the potential to further

simplify the application process for discounted utility service. Again, Bay State supports further investigation of such a strategy since it will, if properly implemented, result in higher penetration for discounted utility service. Ultimately, the decision to move forward with such a strategy will be dependent on, among other things, the cost of implementation.

As the Department continues its investigation regarding the use of a central entity to gather and disseminate relevant information, the option of utilizing MassCARES should be given serious consideration. Although the information provided at [www.masscares.org](http://www.masscares.org) represents a very high level discussion of MassCARES and, as such, is insufficient to fully evaluate the feasibility of this approach at this time, it certainly warrants further investigation, since an agency such as the Massachusetts Executive Office of Health and Human Services is a logical choice for maintaining such a central repository of information.